

Alameda County Make Prisoners, et al. vs. ACSO, et al., Case No. 3:19-cv-07423-JSC

## PLAINTIFFS' EXHIBIT C

Responses to Requests for Admissions from Deputy Joe

With Proofs of Service Attached

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

**PLAINTIFF DARYL GEYER'S RESPONSE**  
**TO INTERROGATORIES FROM**  
**DEFENDANT DEPUTY JOE,**  
**SET ONE**

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff DARRYL GEYER

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE hereby serves the following Requests for Admission on Plaintiff DARRYL GEYER, to be answered, under oath, within thirty (30) days from the date of service.

**RESPONSE TO REQUEST FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:**

Admit that YOU are not asserting any claims in this action against DEFENDANT.

**RESPONSE TO REQUEST FOR ADMISSION NO.1:**

Plaintiff DARRYL GEYER denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

By /s/ Yolanda Huang

Yolanda Huang  
Attorney for Plaintiffs

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Daryl Geyer's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF DARYL GEYER, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS** And Former Prisoners,  
DANIEL GONZALEZ, et al. on behalf of  
themselves and others similarly situated, as a  
Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF DANIEL GONZALEZ'S  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE, SET  
ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff DANIEL GONZALEZ

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff DANIEL GONZALEZ, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 DENY.

10 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

11  
12 By /s/ Yolanda Huang  
13 Yolanda Huang  
14 Attorney for Plaintiffs  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Daniel Gonzalez's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF DANIEL GONZALEZ, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass,

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

**PLAINTIFF RANDY HARRIS' RESPONSE  
TO INTERROGATORIES FROM  
DEFENDANT DEPUTY JOE,  
SET ONE**

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:** Plaintiff RANDY HARRIS

**PROPOUNDING PARTY:** Defendant DEPUTY JOE

**SET NO.:** ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff ERIC WAYNE, to be answered,  
3 under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff RANDY HARRIS denies this request for admission on the grounds that plaintiff  
10 was not informed of and does not know the name of all deputies he came into contact with while  
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this  
12 particular deputy violated any of plaintiff's constitutional rights.

13  
14  
15 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

16  
17 By /s/ Yolanda Huang

18 Yolanda Huang  
19 Attorney for Plaintiffs  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff RANDY HARRIS' Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF ERIC WAYNE, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF CEDRIC HENRY'S RESPONSE  
TO INTERROGATORIES FROM  
DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff CEDRIC HENRY

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff CEDRIC HENRY, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff CEDRIC HENRY denies this request for admission on the grounds that plaintiff  
10 was not informed of and does not know the name of all deputies he came into contact with while  
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this  
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang

16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Cedric Henry's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF CEDRIC HENRY, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.

  
JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com

Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com

Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com

BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer

Amanda F Lashner

Emily S. Kimmelman

MORGAN LEWIS AND BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103

Phone: (215) 963-5000

Fax: (215) 963-5001

Email:

charles.reitmeyer@morganlewis.com

amanda.lashner@morganlewis.com

emily.kimmelman@morganlewis.com

Peter G. Bertling

Jemma S. Parker Saunders

BERTLING LAW GROUP, INC.

21 East Canon Perdido Street, Suite 204B

Santa Barbara, CA 93101-8215

Phone: (805) 879-7558 Fax: (805) 869-1597

Email: peter@bertlinglawgroup.com

jemma@bertlinglawgroup.com

Peter James Van Zandt

Salayha Khaliq Ghoury

LEWIS BRISBOIS BISGAARD & SMITH

45 Fremont Street, Ste 3000

San Francisco, CA 94105

Phone: (415) 362-2580

Fax: (415) 434-0882

Email: peter.vanzandt@lewisbrisbois.com

salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF MICHAEL LOCKHART'S  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff MICHAEL LOCKHART

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff MICHAEL LOCKHART, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff MICHAEL LOCKHART denies this request for admission on the grounds that  
10 plaintiff was not informed of and does not know the name of all deputies he came into contact  
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state  
12 whether this particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang

16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Michael Lockhart's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF MICHAEL LOCKHART, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF JAMES MALLET'S  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff JAMES MALLET

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff JAMES MALLETT, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff JAMES MALLETT denies this request for admission on the grounds that plaintiff  
10 was not informed of and does not know the name of all deputies he came into contact with while  
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this  
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang  
16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff James Mallett's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF JAMES MALLET, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwsllaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwsllaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwsllaw.com  
BURKE, WILLIAMS & SORESENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF DAVID MISCH'S RESPONSE  
TO INTERROGATORIES FROM  
DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff DAVID MISCH

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE hereby serves the following Requests for Admission on Plaintiff DAVID MISCH, to be answered, under oath, within thirty (30) days from the date of service.

**RESPONSE TO REQUEST FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:**

Admit that YOU are not asserting any claims in this action against DEFENDANT.

**RESPONSE TO REQUEST FOR ADMISSION NO.1:**

Plaintiff DAVID MISCH denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

**REQUEST FOR ADMISSION NO. 2:**

Admit that YOU did not assert any claims for "adequate sanitation" against COUNTY in YOUR Fifth Amended Complaint.

**RESPONSE TO REQUEST FOR ADMISSION NO.2:**

ADMIT. Plaintiff David Misch is asserting claims for "inadequate sanitation" against COUNTY in YOUR Fifth Amended Complaint.

**REQUEST FOR ADMISSION NO. 3:**

Admit that YOU did not assert any claims for "adequate sanitation" against ACSO in the Fifth Amended Complaint.

**RESPONSE TO REQUEST FOR ADMISSION NO.3:**

ADMIT. Plaintiff David Misch is asserting claims for "inadequate sanitation" against ACSO in the Fifth Amended Complaint.

1 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

2  
3 By /s/ Yolanda Huang

Yolanda Huang

4 Attorney for Plaintiffs

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff David Misch's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF DAVID MISCH, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.

*Joshua Paiz*

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY, Deputy Joe,**  
Deputy Ignont (sp) John and Jane ROEs, Nos. 1  
– 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF TIMOTHY PHILLIPS'  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff TIMOTHY PHILLIPS

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff TIMOTHY PHILLIPS, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff TIMOTHY PHILLIPS denies this request for admission on the grounds that  
10 plaintiff was not informed of and does not know the name of all deputies he came into contact  
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state  
12 whether this particular deputy violated any of Plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang  
16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Timothy Phillips' Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF TIMOTHY PHILLIPS, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.

*Joshua Paiz*

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORESENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF ERIC RIVERA'S RESPONSE  
TO INTERROGATORIES FROM  
DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff ERIC RIVERA

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff ERIC RIVERA, to be answered,  
3 under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff ERIC RIVERA denies this request for admission on the grounds that plaintiff was  
10 not informed of and does not know the name of all deputies he came into contact with while at  
11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this  
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang

16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Eric Rivera's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF ERIC RIVERA, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.

*Joshua Paiz*

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF RASHEED TUCKER'S  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff RASHEED TUCKER

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff RASHEED TUCKER, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff RASHEED TUCKER denies this request for admission on the grounds that  
10 plaintiff was not informed of and does not know the name of all deputies he came into contact  
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state  
12 whether this particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang  
16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Rasheed Tucker's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF RASHEED TUCKER, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwsllaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwsllaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwsllaw.com  
BURKE, WILLIAMS & SORESEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS** And Former Prisoners,  
DANIEL GONZALEZ, et al. on behalf of  
themselves and others similarly situated, as a  
Class, and Subclass;

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF TIKISHA UPSHAW'S  
RESPONSE TO INTERROGATORIES  
FROM DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff TIKISHA UPSHAW

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff TIKISHA UPSHAW, to be  
3 answered, under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff TIKISHA UPSHAW denies this request for admission on the grounds that  
10 plaintiff was not informed of and does not know the name of all deputies she came into contact  
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state  
12 whether this particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14  
15 By /s/ Yolanda Huang

16 Yolanda Huang  
17 Attorney for Plaintiffs  
18  
19  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Tikisha Upshaw's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF TIKISHA UPSHAW, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com

Yolanda Huang (State Bar No. 104543)  
LAW OFFICES OF YOLANDA HUANG  
PO Box 5475  
Berkeley, California 94705  
Telephone: (510) 329-2140  
Facsimile: (510) 580-9410  
E-Mail: [yolanda@yhuanglaw.com](mailto:yolanda@yhuanglaw.com)

Thomas E. Nanney (State Bar No. 214342)  
Law Office of Thomas E. Nanney  
2217 W. 120th St.  
Leawood, Kansas 66209  
Phone: (816) 401-0047  
Email: [tomnanney@gmail.com](mailto:tomnanney@gmail.com)

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others  
similarly situated, as a Class, and Subclass,

**PLAINTIFFS,**

v.

**ALAMEDA COUNTY SHERIFF'S**  
**OFFICE, ALAMEDA COUNTY,** Deputy  
Joe, Deputy Ignont (sp) John and Jane ROEs,  
Nos. 1 – 25,

**DEFENDANTS.**

Case No. 3:19-cv-07423-JSC

PLAINTIFF ERIC WAYNE'S RESPONSE  
TO INTERROGATORIES FROM  
DEFENDANT DEPUTY JOE,  
SET ONE

Judge: District Judge Jacqueline Scott  
Corley

Trial Date: May 6, 2024

**RESPONDING PARTY:**

Plaintiff ERIC WAYNE

**PROPOUNDING PARTY:**

Defendant DEPUTY JOE

**SET NO.:**

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY JOE  
2 hereby serves the following Requests for Admission on Plaintiff ERIC WAYNE, to be answered,  
3 under oath, within thirty (30) days from the date of service.

4  
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff ERIC WAYNE denies this request for admission on the grounds that plaintiff was  
10 not informed of and does not know the name of all deputies he came into contact with while at  
11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this  
12 particular deputy violated any of plaintiff's constitutional rights.

13  
14  
15 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

16  
17 By /s/ Yolanda Huang

18 Yolanda Huang  
19 Attorney for Plaintiffs  
20  
21  
22  
23  
24  
25

**PROOF OF SERVICE**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.**  
**Case No. 3:19-cv-07423-JSC**

**STATE OF CALIFORNIA, COUNTY OF ALAMEDA**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Eric Wayne's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF ERIC WAYNE, SET ONE** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [office@yhuanglaw.com](mailto:office@yhuanglaw.com) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



---

JOSHUA PAIZ

**SERVICE LIST**

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.  
Case No. 3:19-cv-07423-JSC**

Gregory B. Thomas (SBN 239870)  
E-mail: gthomas@bwslaw.com  
Temitayo O. Peters (SBN 309913)  
E-mail: tpeters@bwslaw.com  
Jasper L. Hall (SBN 341113)  
E-mail: jhall@bwslaw.com  
BURKE, WILLIAMS & SORENSEN, LLP  
1999 Harrison Street, Suite 1650  
Oakland, California 94612-3520  
Tel: 510.273.8780 Fax: 510.839.9104

Charles Reitmeyer  
Amanda F Lashner  
Emily S. Kimmelman  
MORGAN LEWIS AND BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001  
Email:  
charles.reitmeyer@morganlewis.com  
amanda.lashner@morganlewis.com  
emily.kimmelman@morganlewis.com

Peter G. Bertling  
Jemma S. Parker Saunders  
BERTLING LAW GROUP, INC.  
21 East Canon Perdido Street, Suite 204B  
Santa Barbara, CA 93101-8215  
Phone: (805) 879-7558 Fax: (805) 869-1597  
Email: peter@bertlinglawgroup.com  
jemma@bertlinglawgroup.com

Peter James Van Zandt  
Salayha Khaliq Ghoury  
LEWIS BRISBOIS BISGAARD & SMITH  
45 Fremont Street, Ste 3000  
San Francisco, CA 94105  
Phone: (415) 362-2580  
Fax: (415) 434-0882  
Email: peter.vanzandt@lewisbrisbois.com  
salayha.ghoury@lewisbrisbois.com